

EXHIBIT 2

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE POKÉMON COMPANY
INTERNATIONAL, INC., a Delaware
corporation,

Plaintiff,

v.

BRYAN GARCIA CRUZ, an individual,
and DAVID ANDINO MAISONAVE, an
individual,

Defendants.

No. 19-cv-1911MJP

STIPULATION FOR ENTRY OF
JUDGMENT AND PERMANENT
INJUNCTION

Plaintiff The Pokémon Company International, Inc. ("TPCi") and Defendant David Andino Maisonave ("Defendant"), hereby stipulate as follows:

1. TPCi brought suit against Defendant for violations of the Defend Trade Secrets Act, 18 U.S.C. § 1832, *et seq.* and the Washington Uniform Trade Secrets Act, RCW 19.108.010 *et seq.*

2. The Second Amended Complaint alleges that Defendant stole trade secrets from TPCi by taking illicit pictures of pages from an unreleased strategy guide (the "Strategy Guide") created to accompany the release of two highly anticipated video games, Pokémon Sword and Pokémon Shield. Defendant had access to the Strategy Guide as an employee of LSC

STIPULATION FOR ENTRY OF JUDGMENT
AND PERMANENT INJUNCTION
(No. 19-cv-1911MJP) – 1

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1 Communications US, LLC ("LSC Communications"), a company hired to print copies of the
2 Strategy Guide. While at LSC Communications' facility, Defendant took pictures of TPCi's
3 unreleased Strategy Guide on or about November 1, 2019. Defendant shared the illicit pictures
4 of the Strategy Guide with a friend who also knew defendant Bryan Garcia Cruz ("Mr. Cruz").
5 Defendant's friend shared the pictures of the Strategy Guide in a group chat that included Mr.
6 Cruz. Mr. Cruz then posted the pictures taken by Defendant on the Internet.

7 3. In the Second Amended Complaint, TPCi sought monetary damages among other
8 relief.

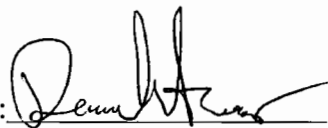
9 4. The parties have agreed to the entry of a Stipulated Judgment against Defendant,
10 in the form reflected in Exhibit A attached hereto. The parties have agreed to the entry of a
11 Stipulated Permanent Injunction in the form reflected in Exhibit B attached hereto.

12 IT IS SO STIPULATED.

13 DATED: June 10, 2021

14
15 By: s/ Jacob P. Dini
16 Lauren W. Staniar, WSBA No. 48741
17 Jacob P. Dini, WSBA No. 54115
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21 *Attorneys for Plaintiff, The Pokémon*
22 *Company International, Inc.*

By: 
David Andino Maisonave
221 W Laurel Street
Willard, OH 44890-1342

Defendant

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE POKÉMON COMPANY
INTERNATIONAL, INC., a Delaware
corporation,

Plaintiff,

v.

BRYAN GARCIA CRUZ, an individual,
and DAVID ANDINO MAISONAVE, an
individual,

Defendants.

No. 19-cv-1911MJP

STIPULATED JUDGMENT

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

FINDINGS AND CONCLUSIONS:

1. This is an action for violations of the Defend Trade Secrets Act, 18 U.S.C. § 1832, *et seq.* and the Washington Uniform Trade Secrets Act, RCW 19.108.010 *et seq.*

2. The Second Amended Complaint alleges that Defendant stole trade secrets from Plaintiff The Pokémon Company International (“TPCi” or “Plaintiff”) by taking illicit pictures of pages from an unreleased strategy guide (the “Strategy Guide”) created to accompany the release of two highly anticipated video games, Pokémon Sword and Pokémon Shield. Defendant had access to the Strategy Guide as an employee of LSC Communications US, LLC (“LSC Communications”), a company hired to print copies of the Strategy Guide. While at LSC

STIPULATED JUDGMENT
(No. 19-cv-1911MJP) – 1

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 2 about November 1, 2019. Defendant shared the illicit pictures of the Strategy Guide with a
 3 friend who also knew defendant Bryan Garcia Cruz ("Mr. Cruz"). Defendant's friend shared the
 4 pictures of the Strategy Guide in a group chat that included Mr. Cruz. Mr. Cruz then posted the
 5 pictures taken by Defendant on the Internet.

6 3. In the Second Amended Complaint, TPCi sought monetary damages, among other
 7 relief.

8 4. The Court has jurisdiction over the subject matter of the federal claim under 28
 9 U.S.C. § 1331 and 18 U.S.C. § 1836(c) because the claim arises under the Defend Trade Secrets
 10 Act, 18 U.S.C. §§ 1832, *et seq.* The Court has supplemental jurisdiction over the related state
 11 law claim under 28 U.S.C. § 1367(a).

12 6. Venue is proper in this Court under 28 U.S.C. § 1391.

13 7. The Court has personal jurisdiction over Defendant for the purposes of entry and
 14 enforcement of this Judgment.

15 JUDGMENT

16 Based on the Parties' stipulation, judgment is entered in favor of Plaintiff and against
 17 Defendant on Plaintiff's claims for violations of the Defend Trade Secrets Act, 18 U.S.C. § 1832,
 18 *et seq.* and the Washington Uniform Trade Secrets Act, RCW 19.108.010 *et seq.* Defendant is
 19 liable to Plaintiff for \$150,000 in monetary damages, attorneys' fees and costs.

20 RETENTION OF JURISDICTION

21 IT IS FURTHER ORDERED that this Judgment is final and may not be appealed by
 22 either party. The Court shall retain jurisdiction for the purposes of construing, modifying, and
 23 enforcing this Judgment.
 24
 25
 26

IT IS SO ORDERED.

DATED: _____, 2021

THE HONORABLE MARSHA J. PECHMAN
United States District Judge

Presented by:

s/ Jacob P. Dini

Lauren W. Staniar, WSBA No. 48741

Jacob P. Dini, WSBA No. 54115

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Attorneys for Plaintiff,

The Pokémon Company International, Inc.

STIPULATED JUDGMENT
(No. 19-cv-1911MJP) – 3

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EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE POKÉMON COMPANY
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v.

BRYAN GARCIA CRUZ, an individual,
and DAVID ANDINO MAISONAVE, an
individual,

Defendants.

No. 19-cv-1911MJP

STIPULATED PERMANENT INJUNCTION

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

FINDINGS AND CONCLUSIONS:

1. This is an action for violations of the Defend Trade Secrets Act, 18 U.S.C. § 1832, *et seq.* and the Washington Uniform Trade Secrets Act, RCW 19.108.010 *et seq.*

2. The Second Amended Complaint alleges that Defendant stole trade secrets from Plaintiff The Pokémon Company International (“TPCi” or “Plaintiff”) by taking illicit pictures of pages from an unreleased strategy guide (the “Strategy Guide”) created to accompany the release of two highly anticipated video games, Pokémon Sword and Pokémon Shield. Defendant had access to the Strategy Guide as an employee of LSC Communications US, LLC (“LSC

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 2 Communications’ facility, Defendant took pictures of TPCi’s unreleased Strategy Guide on or
 3 about November 1, 2019. Defendant shared the illicit pictures of the Strategy Guide with a
 4 friend who also knew defendant Bryan Garcia Cruz (“Mr. Cruz”). Defendant’s friend shared the
 5 pictures of the Strategy Guide in a group chat that included Mr. Cruz. Mr. Cruz then posted the
 6 pictures taken by Defendant on the Internet.

7 3. The Court has jurisdiction over the subject matter of the federal claim under 28
 8 U.S.C. § 1331 and 18 U.S.C. § 1836(c) because the claim arises under the Defend Trade Secrets
 9 Act, 18 U.S.C. §§ 1832, *et seq.* The Court has supplemental jurisdiction over the related state
 10 law claim under 28 U.S.C. § 1367(a).

11 4. Venue is proper in this Court under 28 U.S.C. § 1391.

12 5. The Court has personal jurisdiction over Defendant for the purposes of entry and
 13 enforcement of this Injunction.

14 INJUNCTION

15 Based on the Stipulation of the Parties, Defendant is enjoined as follows:

16 A. Defendant will not access, use, disclose, disseminate or misappropriate TPCi’s
 17 confidential and trade secret information.

18 B. Defendant will not aid, assist or support, in any way, any other person or entity in
 19 undertaking the actions described in Paragraph A above.

20 BINDING EFFECT

21 IT IS FURTHER ORDERED that this Injunction shall be binding upon and inure to the
 22 benefit of the parties and all successors, assigns, parent entities, subsidiaries, officers, directors,
 23 members, shareholders, distributors, agents, affiliates, and all other persons who are in active
 24 concert or participation with anyone described herein, who receive actual notice of this
 25 Injunction by personal service or otherwise.
 26

STIPULATED PERMANENT INJUNCTION
 (No. 19-cv-1911MJP) – 2

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RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Injunction is final and may not be appealed by either party. The Court shall retain jurisdiction for the purposes of construing, modifying, and enforcing this Permanent Injunction.

IT IS SO ORDERED.

DATED: _____, 2021

THE HONORABLE MARSHA J. PECHMAN
United States District Judge

STIPULATED PERMANENT INJUNCTION
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